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OSMOSE UTILITIES SERVICES, INC.

COMMENTS ON THE OFFICE OF PESTICIDE PROGRAM'S

PRELIMINARY RISK ASSESSMENT

FOR METAM SODIUM REREGISTRATION ELIGIBILITY DECISION

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Osmose Utilities Services, Inc. appreciates the opportunity to submit comments on the preliminary risk assessment for the Reregistration Eligibility Decision (RED) for Metam-Sodium. Osmose Utilities Services, Inc. is both the registrant of an end-use product containing metam sodium and an applicator of metam sodium products. Osmose use of metam sodium is for the remedial treatment of utility poles; therefore our comments are on the agency's review of that use of chemical as provided in *"Metam Sodium: Occupational and Residential Exposure Assessment of Antimicrobial Uses for the Reregistration Eligibility Decision Document. PC Code 039003 (Metam Sodium) and 068103 (MITC)" April 13, 2004.*

In section 3.1 of the above mentioned document, it states "The product, Woodfume, is packaged in 5 gallon containers." While it is true that this product was packaged in 5 gallon containers in the past, it is now packaged in 1 gallon containers. The use of the smaller container size allows the applicator to apply the product direct from the container, thus helping to limit pre-application handling by the applicator. This section of the document goes on to explain how the holes that are drilled into the poles are then "capped with a treated wooden plug". In recent years some utility companies have requested that a durable plastic plug be used in place of the wood plug. While the wooden plug is still

predominately used, mention of the use of the plastic plug should also be included in this statement.

In terms of Personal Protective Equipment (PPE), the Osmose Woodfume label states “Wear protective clothing and rubber gloves.” The label does not specify the use of goggles, as it is stated in Section 3.1. While the label does not specifically require the use of eye protection, Osmose requires its own applicators to wear goggles. All Osmose employees applying pesticides must complete the Osmose Pesticide Training Program. The training program advises applicators of Woodfume of the following:

*“Always wear eye protection to prevent splattering Woodfume in eyes, especially when driving in plugs. Do not get the liquid on clothes or shoes since a reaction with water or sweat can cause skin irritation or burns. Avoid contact with hands by wearing impermeable rubber gloves. Take care not to contaminate the inside of gloves with Woodfume.”*

These recommendations are based on years of experience with the handling and application of Woodfume.

In the first full paragraph on page 6 of this document, the first sentence states “The potential for occupational exposure is based on the loading and application of the product using a hand-held pressurized pump/injector.” With the use of the 1 gallon containers, Osmose has eliminated the “loading” step in the application of Woodfume. A “hand-held pressurized pump/injector” is not used in the application of Woodfume. Woodfume is applied by pouring from pre-packaged one-gallon containers which have been equipped with spouts. The containers are calibrated to ensure that the correct dosage is applied per drilled

hole. At no time is pressure used in the application of Woodfume. It is strictly a gravity pour method of application.

Osmose Utilities Services, Inc. appreciates EPA contacting them for information on the application of metam sodium to utility poles, and would gladly assist in providing any additional information that may be needed. At the end of the report on occupational and residential risk assessment, the possibility of the need for risk mitigation for workers is mentioned. If the agency determines that there is a need for risk mitigation with the application of metam sodium to utility poles, Osmose would appreciate the chance to participate in any discussions that would result in a change in its operations (i.e. additional PPE).

Thanking you in advance for your consideration of these comments when preparing the RED for metam sodium.